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Forrest J. Eichmann
135 Cemetery Road
Woodstown, NJ

November 19, 1996

Secretary, FCC
1919 M. Street, NW
Room 222
Washington, DC 20554

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Re: Advanced Television System
and their impact upon the Existing
Television Broadcast Services

MM Docket No. 87-268

Dear Chairman Hundt:

Salem County, New Jersey wishes to express its strong support for Federal Communications Commission action to reallocate the current UHF broadcast television channels 60-69, and make a portion of that spectrum available for public safety use. The first step in the process is reallocation of UHF channels 60-69 as proposed by your staff in the above referenced digital television proceeding.

There is currently an urgent need in many parts of the country for additional public safety radio channels. The PSWAC released its final report that found that public safety agencies need at least 2.5 MHz of additional spectrum right now for interoperability, at least 25 MHz within five years, and an additional 70 MHz within the next fifteen years.

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Salem County agrees with the PSWAC findings. In our area of the country there are no additional radio channels available for the expansion of existing systems nor for the implementation of new ones. Those of us having a mandate to provide life and property protection communications services are stifled by this lack of spectrum. Only immediate FCC action in making available new spectrum can help alleviate the problems faced by Salem County and many other public safety agencies around the nation.

Salem County is currently licensed to operate public-safety radio communications on frequencies derived from sharing of the TV channels under 47 CFR, Part 90, Subpart L, Authorization in the Band 470-512 MHz(UHF-TV Sharing) of the FCC Rules. Ten(10) radio channels in this band provide the delivery of life saving and property forty-three(43) police, fire and emergency medical agencies to a population of approximately 68,000 citizens and workers located in 20 square mile of Vineland, NJ.

This 24-hour-per-day, public safety radio system, at a cost of three(3) million dollars of taxpayers money, is essential to preserving the health and welfare of the general public. The Commission's proposal to allow TV broadcast stations to operate on adjacent TV channels 18 and 21 frequencies in Secaucus and Vineland, New Jersey would create harmful interference to our public safety communications, thus jeopardizing our ability to deliver the life safety and property protection services to which we are bound by law or character.

We call to the attention of the Commission that the docket identifies separation of the proposed TV station from the center of the urbanized area, in this instance Philadelphia, PA, as less than the technically appropriate 110 miles between the broadcast operation site and the nearest adjacent channel land mobile site. Thus the distance from the currently licensed operations and the proposed adjacent DTV channel is not the desired 110 miles, but considerably less as evidenced.



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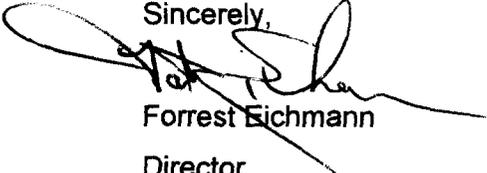
Our radio system, which operates on channels in the TV Channel 19 spectrum, will be impacted by interference from the proposed implementation of TV Channel 18 in Secaucus, NJ. The geographical coordinates of this proposed DTV transmitter is 40-42-43N, 74-00-49W. Our currently licensed transmitter sites are located at the geographical coordinates 39-32-37N, 75-09-24W and 39-34-00W, 75-28-00N. This is a separation of only 100 miles. It is our position that such close spacing of interfering transmitters will jeopardize the delivery of services.

We also urge the Commission not to eliminate use of Channel 20 for land mobile service in the Philadelphia region. Many public-safety agencies have implemented operations on these channels at a great expenditure of public funds.

We respectfully ask you to consider the impact of this proceeding on the public-safety entities operating on channels 19 and 20. With no other channel availability, where in the radio spectrum would they move? Who would pay for this? Is it fair and appropriate to expect the local tax base to absorb such a mandate? Is this compliant with Congressional mandates?

Salem County, New Jersey urges the Commission to act expeditiously and favorably in this matter.

Sincerely,



Forrest Eichmann

Director

cc:

Congressman Frank A. LoBiondo

Senator Frank R. Lautenberg

Senator Bill Bradley

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